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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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February 13, 1990

TO: Lynn Kunzler, Acting Permit Supervisor
FROM: Henry Sauer, Reclamation Soils Specialist *HS*
RE: Initial Completeness Review, Valley Camp Coal Company of Utah, Inc., ACT/007/001, Folder #2, Carbon County, Utah

UMC 783.14 Geology Description R614-301-620 & 624.220

(1)(iii) and (2)(iii)

The operator must commit to regularly sample roof, floor and midseam material for acid- and/or toxic forming potential. The applicant's commitment must include sampling frequency and location, specific parameters and methodology of analysis. In addition the plan must commit to conduct monitoring on an annual basis or more, if the general location of the mining operations change and this change results in a modification to the quality of the roof, floor and mid-seam.

Additionally, verbage regarding previously collected data found in Volume I, Section R614-301-623.100 must be consistent and accurate. The data found in Table R614-301-623.100a must be clearly identified as to its source (coal, roof and floor material, soil, etc.), sample site location and laboratory methodologies utilized. Statements regarding the presence or absence of acid and toxic-forming materials must be substantiated and verified.

UMC 783.21: Soil Resource Information - R614-301-223

- a. The Carbon Area Soil Survey (Soils Conservation Service) is now published and publicly available. The survey encompasses the entire Valcam Loadout Facility (VLF) permit area and portions of the Belina Mine Complex and haul road. Therefore soil descriptions located in the Permit Application Package (PAP) must be correlated to the National Cooperative Soil Survey for the Carbon area.

Additionally, the operator eludes to the fact that the soil survey for the Valley Camp PAP was based on baseline data and surveys done for the Skyline Mine PAP. This must be clearly stated within the PAP.

b. R614-301-224

The applicant must adequately identify all material which is proposed as substitute topsoil for final and contemporaneous reclamation (i.e. sediment pond waste, existing fill underlying the VLF and Belina Mine Complex and haul road). Identification must include sample site locations on an appropriate map or plate, sample collection methodologies and laboratory methodologies employed.

UMC 783.24 Maps: General Requirements R614-301-521.160

All maps must be properly identified to include scale and legend. Please make necessary changes.

UMC 783.25 Cross Section, Maps and Plans R624-30-512.120

The applicant should provide adequate maps, plates, photographs, etc., which delineate the extent of surface disturbance which presently exists.

UMC 784.13 Reclamation Plan: General Requirements R614-301-243

(4) The applicant must describe the sampling program which will be employed on the redistributed soil/spoil. The program should include sampling procedures and constituents analyzed.

The applicant must commit to mulching all areas to be reclaimed. Please insert this commitment into the appropriate sections of the PAP.

UMC 785.19 Underground Coal Mining Activities on Areas or Adjacent to Areas Including Alluvial Valley Floors In the Arid or Semi-Arid Areas of Utah R616-302-321.100-300

The applicant must submit at a minimum, the following information to demonstrate the probable existence and extent of an alluvial valley floor.

c(1)(i)

Adequate geologic information necessary to define the clast characteristics and the sedimentary pattern of Unconsolidated Stream Laid Deposits adjacent to and within the Valcam Loadout Facility permit area.

(c)(1)(ii & iii)

The PAP must incorporate a map that clearly delineate currently or historically flood irrigated areas (i.e. shows diversion structures, headgates, impoundments). Areas with various types of agriculture activities (pasture lands, improved pasture, undeveloped rangeland, etc.) must be mapped and accompanied by measurements of vegetation in terms of productivity and type. These maps must encompass both the Valcam Loadout Facility permit area and adjacent areas.

(c)(1)(iv)

The applicant must provide documentation that the area adjacent to and within the Valcam Loadout Facility permit area are, or are not, subirrigated, based on ground water monitoring and soil moisture data.

(c)(1)(v)

The applicant must provide documentation that areas identified are, or are not, flood irrigable, based on streamflow, water quality, water yield, and topographic characteristics.

(c)(1)(vi)

Provide a series of aerial photographs, to include infrared imagery at a time of year to show any late summer and fall differences between upland and valley floor vegetative growth and a scale adequate for reconnaissance identification of areas that may be alluvial valley floor.

cc: R. Summers
D. Darby
BT37/72-74